Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of ）

The Commercial Mobile Alert System ）

） PS Docket No.07-287

COMMENTS OF NENA

The National Emergency Number Association ("NENA") hereby
responds to the invitation to comment in the captioned proceeding.[1] The
more informative and geographically targeted the warnings of a Commercial
Mobile Alert System ("CMAS"), the more manageable will be the critical
complementary tasks of the Public Safety Answering Points ("PSAPs") and
local and state 9-1-1 authorities comprising NENA's core membership.

CAP. NENA supports the recommendation (Notice, 14) of the
Commercial Mobile Service Alert Advisory Committee ("CMSAAC") for use of
a Common Alerting Protocol ("CAP"). The CAP standard is an
internationally recognized and widely implemented standard. The use of
open standards, such as CAP, is wholly consistent with NENA's approach to
the implementation of an integrated 9-1-1 and emergency communications
system. Such a common and open standard makes it possible to coordinate
performance of cellular telephone with other alerting systems. It enables
state and local governments to choose new solutions for public warning after

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[1] Notice of Proposed Rulemaking, FCC 07-214, released December 14, 2007, 73 Federal
Register 545, January 3, 2008. ("Notice")

initial procurement decisions are made and creates a competitive marketplace to ensure the public safety community and the public are most effectively served.

Precision targeting. The CMSAAC report would require targeting to be no less than county-level in size. We respectfully suggest greater granularity, if possible. Warning originators need to be able to target precisely and flexibly. Some counties are very large. We need to ensure that the CMAS remains relevant and that people don't tune out because of too many or too vague warnings. Thus, we believe local governments or authorities ought to be able to initiate alerts, along with state and federal agencies.

Furthermore, broadcasting over large areas magnifies potential cost consequences. We should seek to minimize unnecessary and avoidable impacts on telecommunications infrastructures and on portions of the public not at risk. In this respect, ideal models are emergency telephone notification systems, where messages can be targeted down to the block level.[2] But this is likely not possible in the CMRS environment, as we understand it.

Message capacity. NENA submits that 90 characters might not allow enough text for an effective warning that explains what the emergency is and

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[2] Emergency Notification Telephone Systems (ENTS) is defined as a "Specific category for a system that uses the telephone – in conjunction with other elements – including computer-based hardware and software to notify persons of an emergency." NENA Master Glossary of 9-1-1 Terminology, NENA-00-001, Version 10, June 5, 2007.

what to do about it. If recipients are not well-informed, their confusion may lead to deluges of calls to 9-1-1.

Our job is to take all the calls we can, but we can also plan to leave room on the lines for callers whose needs may be wholly independent of the CMAS warning. Alerts should be specific and actionable to avoid any possible confusion, which 90 characters may not allow. This makes important coordination with other media outlets such as TV and radio.

Balance. NENA agrees that there needs to be a balance between providing sufficient information in any message while also recognizing that wireless carriers may have legitimate capacity concerns. It would do us no good if we provided significant information in a warning but the end result was to bring down a network, making it impossible for any calls, including 9-1-1 calls, to be transmitted. While respecting that balance, we seek to have the most informative and geographically targeted messages possible.

Inclusion of Dialable Numbers. Related to message and network capacity is whether or not to include references in alert messages directing recipients to call a telephone number, such as 3-1-1, for more information. If a local or state system were effectively administered to enable alert recipients to have immediate access to more information than available in a 90-character message, this could be a useful capability. Of course, we would not recommend alert messages that suggest calling 9-1-1 for general information, as 9-1-1 should only be used for emergency situations. In the end, this issue

goes back to the overall need to ensure that alert recipients have clear and actionable information versus the need to ensure the overall telecommunications system is not incapacitated by dramatic usage spikes.

Informing PSAPs. We must ensure that PSAPs get all available information related to alerts, possibly in more detail than the alert messages themselves. This will permit PSAPs to know the issue that people are calling about. PSAPs should be among the first to know when an alerting emergency has ended.

Testing.   Allowance must be made for ample training of operational personnel in the origination of alerts. We cannot afford to wait until the big event to do something for the first time. The effect on PSAPs of untested alerting will be confusing and possibly damaging.

Respectfully submitted,

NENA

By

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